

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ROBERT KALVITZ,)	CASE NO. 1:16-cv-00748
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR.
)	
v.)	DEFENDANT CITY OF
)	CLEVELAND'S WITNESS LIST &
CITY OF CLEVELAND, et al.)	AMENDED EXHIBIT LIST
)	
Defendants.)	

Pursuant to the Court's Civil Trial Order (i.e., [Doc. 55], Defendant City of Cleveland submits its witnesses list and exhibit list. The City reserves the right to add or delete names or exhibits on the lists prior to trial. Also, under the Civil Trial Order, the City, in an effort to avoid the duplication of exhibits, is willing to submit all of its listed exhibits as joint exhibits if Plaintiff and all three Co-Defendants agree to do so prior to the July 12, 2019 deadline for the exchange of proposed exhibits.

I. Witness List.

	<u>Name</u>	<u>Subject</u>
1.	Plaintiff	5/16/14 or 5/17/14 Incident
2.	Defendant Christopher Randolph	(same)
3.	Defendant Jeffrey Follmer	(same)
4.	Defendant Steven Kinas	(same)
5.	Raytheon Martin	(same)/victim
6.	Sgt. Jonathan Moran	Responding Cleveland police officer
7.	P.O. Anthony Gonzalez	(same)
8.	P.O. Mark Maguth	(same)
9.	Chief of Police Calvin Williams	Background information regarding the employment status of the three individual defendants at the time of the incident referenced in the Complaint and rebuttal to Plaintiff's <i>Monell</i> claim
10.	Deputy Chief of Police Joellen O'Neill	(same)
11.	Custodian(s) of records as needed	Self-explanatory

II. Exhibit List.

1. Police Report Record Management System (RMS) No. 201400140593
2. Event Chronology 201400140593
3. Audio recording(s)
4. Daily Duty Assignment – Second District/Third Platoon 5/16/14
5. Daily Duty Report for 5/16/14 – Sgt. Jonathan Moran
6. Daily Duty Report for 5/16/14 – P.O. Anthony Gonzalez/P.O. Mark Maguth
7. Daily Duty Assignment – Third District/4322 Platoon 5/17/14 (Randolph)
8. Daily Duty Report for 5/17/14 (Randolph)
9. Daily Duty Assignment – Personnel Unit/First Shift 5/17/14 (Follmer/Kinas)
10. The Manual of Rules for the Conduct and Discipline of Employees of the Division of Police
11. General Police Order 2.1.01 (Use of Force) (3 22 13)
12. Collective bargaining agreement (excerpts) (4/1/13-3/31/16)
13. Plaintiff's answers & responses to discovery
14. Plaintiff's declaration filed with opposition to summary judgment
15. Property Held Evidence for Owner (Items 1 & 2 + Plaintiff's Driver's License) for RMS 201400140593 (Plaintiff)
16. ER Records Fairview Hospital (5/17/14) produced by Plaintiff
17. Medical records by Francis Mccafferty, M.D. produced by Plaintiff
18. Medical records by Michelle Inkster, M.D. produced by Plaintiff
19. Psychological Report (7/24/14) by Eddie Meyers, Ed.D. produced by Plaintiff
20. Plaintiff's medical records produced on or about June 19, 2019
21. Malpractice complaint filed by Plaintiff on or about May 31, 2019 – Cuyahoga County Common Pleas Court Case No. CV-19-916176

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this 8th day of July, 2019, the above document was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

s/William M. Menzalora

WILLIAM M. MENZALORA